

SK:MWG
F. #2019R01511

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

DARNELL LEONARD,

Defendant.

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TO BE FILED UNDER SEAL

**AFFIDAVIT AND COMPLAINT IN
SUPPORT OF AN APPLICATION FOR
AN ARREST WARRANT**

(18 U.S.C. §§ 1951(a) and 2)

20-MJ-46

EASTERN DISTRICT OF NEW YORK, SS:

KIERAN KEENAGHAN, being duly sworn, deposes and states that he is a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), duly appointed according to law and acting as such.

On or about October 19, 2019, within the Eastern District of New York and elsewhere, the defendant DARNELL LEONARD, together with others, did knowingly and intentionally conspire to obstruct, delay and affect commerce and the movement of articles and commodities in commerce, by robbery, to wit: the robbery of jewelry from a jewelry store located at 9 Hanover Place in Brooklyn, New York.

(Title 18, United States Code, Sections 1951(a) and 2)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I am a Detective and Task Force Officer assigned to ATF and the New York City Police Department ("NYPD") Joint Robbery Task Force. I have been a Detective with the NYPD since 1999. I have been a Task Force Officer with the ATF/NYPD Joint Robbery Task Force since 2014. I have been involved in the investigations of numerous cases involving Hobbs Act robberies and related firearms offenses. I am familiar with the facts and circumstances set forth below from my participation in the investigation, my review of the investigative file, and from reports of other law enforcement officers involved in the investigation.

2. The United States is investigating a pattern of armed robberies that occurred in Brooklyn, New York and elsewhere in or about and between September 2019 and October 2019.

3. On or about October 19, 2019, a robbery occurred at a jewelry store at 9 Hanover Place in Brooklyn, New York.

4. Law enforcement agents responded to the scene of the robbery and recovered surveillance videos from within the store later that day. Based on the surveillance videos, at approximately 12:22 p.m., three individuals entered the jewelry store. One of the individuals brandished a firearm. All three individuals then took jewelry chains worth approximately \$15,000 from the owner of the store at gunpoint.

¹ Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest, I have not described all the relevant facts and circumstances of which I am aware.

5. The following is a still image of video surveillance depicting one of the robbers:




6. I have reviewed photographs of DARNELL LEONARD from law enforcement databases and known social media posts and compared them to the video surveillance footage above. Based on those comparisons, I believe that LEONARD is the individual depicted in the surveillance video above.

7. LEONARD and the two other individuals fled the scene. Shortly thereafter, a witness observed a dark colored sedan make a sudden U-turn and drive away.

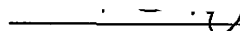
8. On December 10, 2019, the Honorable Robert M. Levy, United States Magistrate Judge, Eastern District of New York, signed a warrant authorizing the search of historical cell-site data for a cellphone associated with DARNELL LEONARD. Historical cell-site data establishes that LEONARD's cellular telephone was located within close

proximity to the jewelry store at 9 Hanover Place in Brooklyn, New York on October 19, 2019 at 12:16 p.m. (i.e., six minutes before the above-described armed robbery began).

WHEREFORE, your deponent respectfully requests that the defendant DARNELL LEONARD be dealt with according to law.


KIERAN KEENAGHAN
Detective/Task Force Officer
NYPD/ATF Joint Robbery Task Force

Sworn to before me this
14th day of January, 2020


THE HONORABLE RAMON E. REYES, JR.
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF NEW YORK